UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

J.

JAMES GINDIN,

Case No.: 2:18-cv-13235 Hon. Arthur J. Tarnow

Plaintiff,

V.

JEFF GLOVER & ASSOCIATES, INC., A MICHIGAN CORPORATION, JEFF GLOVER, an Individual, JAD SWEIS, an Individual, COLBY LOOMIS, an Individual AND ANTHONY BERTRAND, an Individual

Defendants.

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DEFENDANTS JEFF GLOVER'S, JEFF GLOVER & ASSOCIATES, INC.'S AND COLBY LOOMIS' PRELIMINARY WITNESS LIST

DEFENDANTS JEFF GLOVER'S, JEFF GLOVER & ASSOCIATES, INC.'S AND COLBY LOOMIS' PRELIMINARY WITNESS LIST

Defendants JEFF GLOVER, JEFF GLOVER & ASSOCIATES, INC. and COLBY LOOMIS, by and through their undersigned counsel, and for their Preliminary Witness List, state as follows:

WITNESSES1

- I. Parties, including, but not limited to:
 - A. James Gindin
 - B. Jeff Glover
 - C. Jeff Glover & Associates, Inc.
 - D. Jad Sweis
 - E. Colby Loomis
 - F. Anthony Bertrand
- II. Other Fact or Lay Witnesses, including, but not limited to:
 - A. Friends, family, and/or associates of James Gindin.
 - B. Current or potential employers and/or educators of James Gindin.
 - C. Any and all agents, employees, or contractors of James Gindin.
 - D. Any and all agents, employees, and contractors of Plymouth Canton Realty, LLC including, but not limited to:
 - 1. MaryBeth Kaljian
 - E. Any and all agents, employees, and contractors of Keller Williams Realty, Inc.

References to individuals and/or entities herein may include (whether actual or ostensible) any/all former/current agents, servants, employees, employers, departments, branches, subdivisions, independent contractors, and/or record custodians. Fact witnesses may be called upon to offer expert testimony within the scope of their specialty or specialties.

including, but not limited to:

- 1. Rene McDonald
- 2. Kary Sutter
- 3. Kayla Swanson
- 4. Cale Woods
- 5. Darryl Frost
- F. Taylor Kerrigan
- G. Ariel Toldeo.
- H. Any and all agents, employees, and contractors of Kai Data, LLC.
- I. Any and all agents, employees, and contractors of Real Estate Data Exchange, Inc.
- J. Any and all agents, employees, and contractors of Defendant's Telephone Service Provider(s).

III. Experts, including, but not limited to:

- A. Specialists in the area of communications, information technology, and/or related fields, including, but not limited to:
 - Ray Horak (expected to testify regarding matters within the scope of his specialties)
 Context Corporation
 1500A East College Way, PMB 443
 Mount Vernon, WA 98273
 - B. Any and all specialists/experts utilized by Plaintiff in this matter.
 - C. Any and all specialists/experts utilized by any/all co-defendant(s) in this matter.
 - D. Any and all necessary rebuttal specialists/experts.
- E. Defendants reserve the right to add supplemental specialists/experts throughout the course of discovery and trial of this matter.

IV. Miscellaneous witnesses, including, but not limited to:

A. All witnesses named in any witness list filed by Plaintiff.

- B. Any and all necessary rebuttal witnesses.
- C. Any and all witnesses that become known up to and through the date of trial.
- D. Any and all individuals named in discovery, including, but not limited to, interrogatories, depositions, pleadings and other documents.
- E. Any and all individuals necessary to authenticate, interpret, identify and/or introduce any and all exhibits.
- F. Defendants reserve the right to supplement its witness list(s) throughout the course of discovery and trial.

Respectfully submitted,

RICH, CAMPBELL & ROEDER, P.C.

By:

KENNETH A/RICH (P38349)

RICH, CAMPBELL & ROEDER, PC Attorneys for Defendant Glover, JG&A and

Loomis

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(248) 406-8000 / (248) 406-8001 – fax

Dated: May 10, 2019

PROOF OF SERVICE

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION Case No. 2:18-cv-13235

The undersigned certifies that a copy of **DEFENDANTS JEFF GLOVER'S. JEFF GLOVER & ASSOCIATES. INC.'S AND COLBY LOOMIS' PRELIMINARY WITNESS LIST** was served upon all parties of record as to the above cause, to their respective addresses as disclosed on the pleadings of record herein, by:

- ☐ Facsimile
- ☐ Certified Mail (postage prepaid)
- □ Hand Delivery
- ✓ E-File/E-Service

On this the 10th day of May, 2019

Jennifer M. Roberge